

February 14, 2022

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Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Cholo Abdi Abdullah
20 Cr. 677 (AT)

Dear Judge Torres:

In light of the logistical difficulties caused by the current worldwide pandemic, this letter is respectfully submitted to jointly request that Your Honor set the following schedule for the filing of initial public and classified motions:

Defense motions: June 14, 2022;
Government response: July 18, 2022;
Defense Reply: August 8, 2022

Due to the impossibility of conducting on the ground investigations at this time, the defense respectfully requests permission to file additional motions should that become appropriate. The defense consents to the exclusion of time for speedy trial purposes until August 8, 2022.

Respectfully submitted,

/s/Andrew Patel
Andrew G. Patel

GRANTED. By **June 14, 2022**, Defendant shall file any motions and the parties shall file blackout dates for the first and second quarters of 2023. By **July 18, 2022**, the Government shall file its opposition to Defendant's motions. By **August 8, 2022**, Defendant shall file his reply, if any.

Time is excluded under the Speedy Trial Act until **August 8, 2022**, because the ends of justice served by excluding such time outweigh the interests of the public and the Defendant in a speedy trial because this will allow time for the parties to prepare and file motions.

SO ORDERED.

Dated: February 14, 2022
New York, New York


ANALISA TORRES
United States District Judge